

GMM/DJB: USAO 2019R00535

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA

v.

KEARA UNIQUE DAVIS,

Defendants

CRIMINAL NO. TDC 20cr0030

(Conspiracy to Pass Counterfeit
Currency, 18 U.S.C. § 371;
Passing Counterfeit Currency,
18 U.S.C. § 472; [REDACTED]
[REDACTED] Aiding
and Abetting, 18 U.S.C. § 2; Forfeiture,
18 U.S.C. § 982(a)(2)(B), 21 U.S.C.
§ 853(p), 28 U.S.C. § 2461(c))

INDICTMENT

COUNT ONE

(Conspiracy to Pass Counterfeit Currency) BY

The Grand Jury for the District of Maryland charges that:

Introduction

At all times relevant to this Indictment:

1. Defendants [REDACTED] KEARA UNIQUE
DAVIS ("DAVIS"), [REDACTED]

[REDACTED] were residents of Maryland.

2. Target Inc., Nordstrom Inc., and The Home Depot, Inc. (collectively, the
"Retailers") were consumer good and home-improvement retailers that operated branch stores in
Maryland, including in Montgomery and Prince George's Counties.

Background on Printing U.S. Currency

3. The Federal Reserve Board ("FRB") was a government agency responsible for
supervising the U.S. banking system. Among other duties, the FRB served as the issuing

U.S. DISTRICT COURT
DISTRICT OF MARYLAND

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DISTRICT OF MARYLAND

DEPUTY

authority for all genuine U.S. currency made from paper (“Federal Reserve Notes”). The FRB had a wide range of responsibilities related to paper money, from ensuring an adequate supply to protecting and maintaining confidence in U.S. currency. To accomplish these goals, FRB worked with the U.S. Department of Treasury (“DOT”), the Bureau of Engraving and Printing (“BEP”), a division of DOT, and the United States Secret Service (“USSS”) to monitor any counterfeiting of, and threats to, Federal Reserve Notes. The FRB considered redesigns to denominations of Federal Reserve Notes based on those threats.

4. BEP was the sole printer of all legitimate U.S. currency. BEP was responsible for printing all paper money and shipping it to one of twelve Federal Reserve vaults located throughout the country where it was securely stored before being placed into circulation.

5. The FRB issued \$1, \$2, \$5, \$10, \$20, \$50, and \$100 denominations of U.S. currency. Each denomination featured a famous American statesman on its face and an image reflective of the nation’s history on the back. Further, each note contained unique identifiers, including a serial number and series year, to validate its issuance.

6. To protect against counterfeiting, each note also contained various security features. Historically, counterfeiters have used a variety of means to make counterfeit U.S. currency. However, in recent years, the majority of counterfeiters made counterfeit currency using standard printers that could be purchased at most electronic retailers. These counterfeiters used a genuine pattern note, that is, legitimate U.S. currency, to serve as a template for the counterfeit note. The printer was used to copy and print images of the genuine pattern note onto pieces of paper. The resulting counterfeit note generally resembled the pattern note and it bore the pattern note’s serial number and series year. However, the counterfeit note typically did not replicate all of the pattern note’s security features.

The Conspiracy

7. From at least in or about 2017, and continuing through at least in or about December 2019, in the District of Maryland and elsewhere, the defendants,

[REDACTED]
KEARA UNIQUE DAVIS,
[REDACTED]

did knowingly and willfully combine, conspire, confederate, and agree with each other, and others known and unknown to the Grand Jury, to pass, utter, publish, and sell, and attempt to sell, falsely made, forged, and counterfeited obligations and other securities of the United States, that is, Federal Reserve Notes, with the intent to defraud, in violation of 18 U.S.C. § 472.

The Purpose of the Conspiracy

8. It was the purpose of the conspiracy for defendants [REDACTED] DAVIS, [REDACTED] [REDACTED] and others known and unknown to the Grand Jury, to enrich themselves through the sale, passing, and uttering of counterfeit currency at the Retailers and other stores. In all, the conspirators passed at least \$95,000, and thereby caused losses to the Retailers and other merchandisers in the same amount.

Manner and Means of the Conspiracy

9. It was part of the conspiracy that:

a. [REDACTED]
[REDACTED]

b. [REDACTED] DAVIS, [REDACTED] traveled, alone and with one another, to pass counterfeit currency at the Retailers and other stores in Maryland, Virginia, and the District of Columbia.

c. At the Retailers and other stores located in Maryland, [REDACTED] DAVIS, [REDACTED] attempted to pass, and did pass, counterfeit currency in exchange for merchandise and genuine U.S. currency. When a counterfeit bill was successfully passed, the passing conspirator informed the other conspirators of the success, over the phone, in person, and electronically, and the other conspirators attempted to pass, and did pass, counterfeit currency with the same cashier.

d. After merchandise had been obtained through the successful pass of counterfeit currency, one of the conspirators (typically not the conspirator who had made the purchase) returned the merchandise for genuine U.S. currency.

Overt Acts

10. In furtherance of the conspiracy and to effect the object thereof, [REDACTED] DAVIS, [REDACTED] committed the following overt acts, among others, in the District of Maryland and elsewhere:

a. [REDACTED]

[REDACTED]

b. On or about January 1, 2018, [REDACTED] purchased a parka from a Nordstrom store in Bethesda, Maryland with four \$100 counterfeit notes. On or about January 2, 2018, DAVIS subsequently returned the parka and received genuine U.S. currency from a Nordstrom store in Columbia, Maryland.

c. On or about January 10, 2018, [REDACTED] purchased various items of sleepwear from a Nordstrom store in Bethesda, Maryland with three \$100 counterfeit notes. On or about January 11, 2018, **DAVIS** subsequently returned the merchandise and received genuine U.S. currency at a Nordstrom store in Lanham, Maryland.

d. On or about March 23, 2018, in the District of Maryland, [REDACTED] and **DAVIS** possessed two \$100 counterfeit notes, linen copy paper, Nordstrom receipts, and an Envy 4520 HP Printer.

e. On or about March 17, 2019, [REDACTED] **DAVIS** purchased electronics from a Target store in Pikesville, Maryland with six \$100 counterfeit notes. On or about March 18, 2019, [REDACTED] subsequently returned the merchandise and received genuine U.S. currency at a Target store in Hyattsville, Maryland.

f. On or about April 16, 2019, [REDACTED] **DAVIS**, [REDACTED] purchased bedsheets and diapers from a Target store in Waldorf, Maryland with five \$100 counterfeit notes. On or about April 16, 2019, **DAVIS** subsequently returned the merchandise and received genuine U.S. currency at a Target store in Hyattsville, Maryland.

g. On or about June 6, 2019, and June 7, 2019, [REDACTED] **DAVIS**, [REDACTED] [REDACTED] purchased bedsheets, computer parts, and a gift card from a Target store in Annapolis, Maryland with seven \$100 counterfeit notes. On or about June 7, 2019, [REDACTED] **DAVIS** subsequently returned all of the merchandise, except the gift card, and received genuine U.S. currency at a Target store in Largo, Maryland.

h. On or about June 14, 2019, **DAVIS** [REDACTED] purchased shoes and clothing from a Nordstrom store in Bethesda, Maryland with six \$100 counterfeit notes. On or

about June 14, 2019, [REDACTED] subsequently returned all of the merchandise and received genuine U.S. currency at a Nordstrom store in Lanham, Maryland.

i. On or about June 19, 2019, [REDACTED] DAVIS, [REDACTED] purchased diapers, bedsheets, and miscellaneous merchandise from a Target in Annapolis, Maryland with eight \$100 counterfeit notes. On or about June 20, 2019, [REDACTED] subsequently returned some of the merchandise and received genuine U.S. currency at a Target store in District Heights, Maryland.

j. [REDACTED]
[REDACTED]

k. [REDACTED]
[REDACTED]








18 U.S.C. § 371



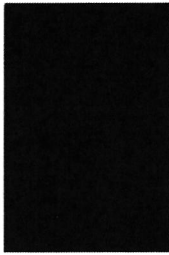


COUNTS TWO THROUGH TWELVE
(Passing Counterfeit Currency)

The Grand Jury for the District of Maryland further charges that:

1. Paragraphs 1 through 6 and 8 through 10 of Count One of this Indictment are realleged and incorporated here.
2. On or about the dates set forth below, in the District of Maryland, the defendants named below, with the intent to defraud, did pass and utter, and attempt to pass and utter, the following falsely made, forged, and counterfeited obligations of the United States, that is, Federal Reserve Notes, which the defendants knew to be falsely made, forged, and counterfeited:

Count	Pass Date	Defendant	Amount, Retailer & Location	Denominations & Serial Numbers Passed
2				
3				
4				

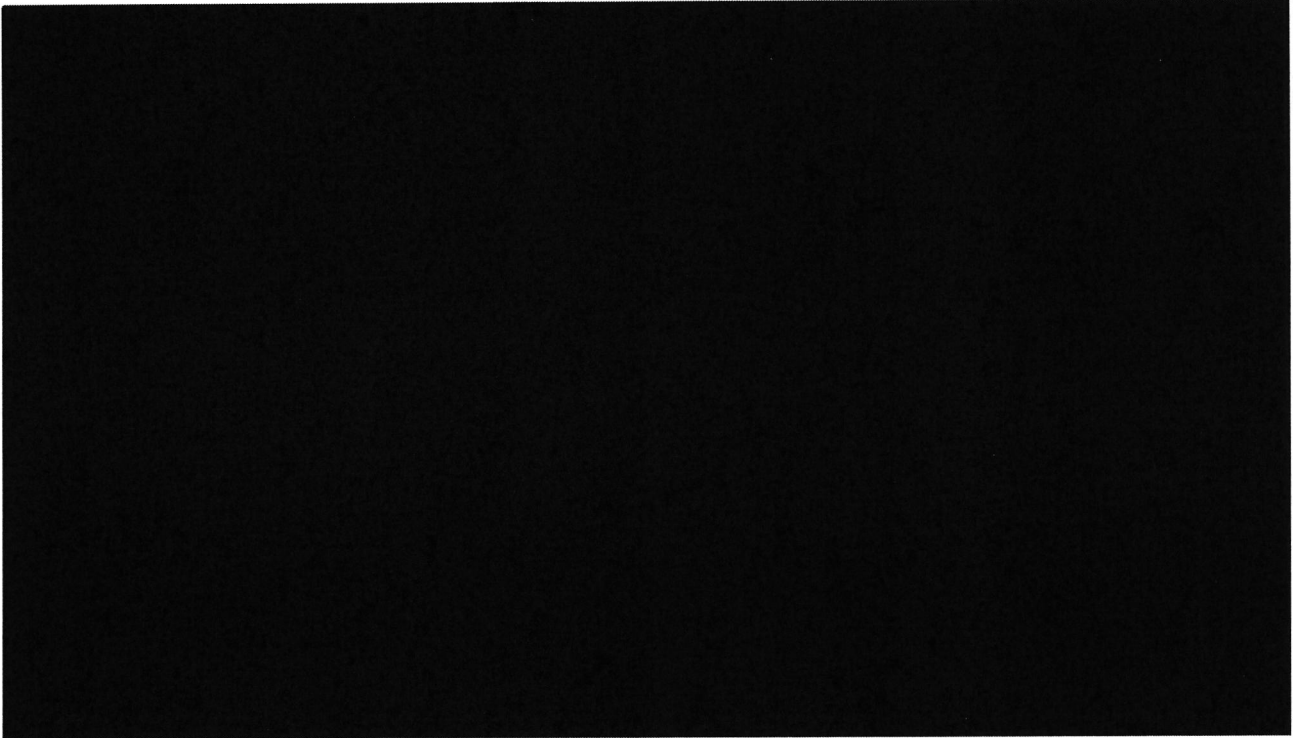
Count	Pass Date	Defendant	Amount, Retailer & Location	Denominations & Serial Numbers Passed
5	March 17, 2019	 and KEARA UNIQUE DAVIS	\$600 Target Pikesville, MD	Three \$100 bills, Series 2009A Serial #: LB36924602H Two \$100 bills, Series 2009A Serial #: LD66061010D One \$100 bills, Series 2013 Serial #: ME66042988A
6				
7	April 16, 2019	 KEARA UNIQUE DAVIS, 	\$500 Target Waldorf, MD	Five \$100 bills, Series 2009A Serial #: LF80346896K
8				
9	June 6, 2019	 KEARA UNIQUE DAVIS, 	\$800 Target Annapolis, MD	Four \$100 bills, Series 2009A Serial #: LF37605546C One \$100 bill, Series 2009A Serial #: LE84867008D Two \$100 bills, Series 2009A Serial #: LK64624704D One \$100 bill, Series 2009A Serial #: LD60833638A

Count	Pass Date	Defendant	Amount, Retailer & Location	Denominations & Serial Numbers Passed
10	June 14, 2019	 and KEARA UNIQUE DAVIS	\$600 Nordstrom Bethesda, MD	Two \$100 bills, Series 2009A Serial #: LL70574035I Two \$100 bills, Series 2009A Serial #: LA51067131B Two \$100 bills, Series 2009A Serial #: LL81153431F
11	June 19, 2019	 KEARA UNIQUE DAVIS, 	\$800 Target Annapolis, MD	Three \$100 bills, Series 2013 Serial #: MA22485551A Two \$100 bills, Series 2009A Serial #: LF46028313I Three \$100 bills, Series 2013 Serial #: MF06946410E
12	August 11, 2019	 KEARA UNIQUE DAVIS, 	\$600 Target Gambrills, MD	Three \$100 bills, Series 2013 Serial #: MB85613080D One \$100 bill, Series 2013, Serial #: MJ08252370A Two \$100, Series 2009A, Serial #: LB93871244C

18 U.S.C. § 472

18 U.S.C. § 2

COUNT THIRTEEN



FORFEITURE ALLEGATION

1. Pursuant to Fed. R. Crim. P. 32.2, notice is hereby given to the defendants that the United States will seek forfeiture as part of any sentence in accordance with 18 U.S.C. § 982 (a)(2)(B), in the event of the defendants' conviction on any of the offenses set forth in Counts One through Thirteen of this Indictment.

Counterfeiting Forfeiture

2. Upon conviction of the offenses set forth in Counts One through Thirteen of this Indictment, the defendants,


KEARA UNIQUE DAVIS,


shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(2)(B), any property, constituting, or derived from, proceeds obtained directly or indirectly, as a result of such offenses.

Substitute Assets

3. If, as a result of any act or omission of the defendant, any such property subject to forfeiture:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c), to seek forfeiture of any other property of said defendant up to the value of the forfeitable property described above.

18 U.S.C. § 982(a)(2)(B)
21 U.S.C. § 853(p)
28 U.S.C. § 2461(c)

Robert K Hur by GMA
Robert K. Hur
United States Attorney

A TRUE BILL:

SIGNATURE REDACTED

Foreperson

1/22/2020
Date